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7 Counsel to Debtors

Alan Gomperts, Daniel Halevy, and

8 Susan Halevy

11 **UNITED STATES BANKRUPTCY COURT**

12 **CENTRAL DISTRICT OF CALIFORNIA – LOS ANGELES DIVISION**

13 In re:

14 SEATON INVESTMENTS, LLC, *et al.*,

15 Debtors and Debtors in  
16 Possession.

Lead Case No. 2:24-bk-12079-VZ

Jointly Administered with Case Nos.:

2:24-bk-12080-VZ; 2:24-bk-12081-VZ;  
2:24-bk-12082-VZ; 2:24-bk-12091-VZ;  
2:24-bk-12074-VZ; 2:24-bk-12075-VZ  
and 2:24-bk-12076-VZ

Chapter 11

**STIPULATION TO FURTHER  
CONTINUE HEARING ON MOTION  
TO AUTHORIZE USE OF CASH  
COLLATERAL PURSUANT TO 11  
U.S.C. § 363(c)(2)**

Current Hearing:

Date: October 8, 2024

Time: 11:00 a.m.

Crtrm.: 1368

Proposed Continued Hearing:

Date: November 12, 2024

Time: 11:00 a.m.

Crtrm: 1368

- ☐ Affects All Debtors.
- ☐ Affects Seaton Investments, LLC
- ☐ Affects Colyton Investments, LLC
- ☐ Affects Broadway Avenue Investments, LLC
- ☒ Affects SLA Investments, LLC
- ☒ Affects Negev Investments, LLC
- ☒ Affects Alan Gomperts
- ☐ Affects Daniel Halevy
- ☒ Affects Susan Halevy

SLA Investments, LLC ("SLA"), Negev Investments, LLC ("Negev"), Susan Halevy ("Susan" or "Susan Halevy"), and Alan Gomperts ("Alan" or "Alan Gomperts"), debtors and debtors-in-possession (the "Debtors"), Archway Real Estate Income Fund I SPI I, LLC ("Archway"), Wells Fargo Bank National West ("Wells Fargo") as to the 2220 Bagley Ave and 3538 Greenfield Properties, and Harvest Small Business Finance, LLC ("Harvest") (Archway, Wells Fargo and Harvest, collectively, the "Lenders")— in the above-entitled jointly administered chapter 11 bankruptcy cases (the "Bankruptcy Cases") hereby stipulate as follows:

**RECITALS**

1. On March 18 and 19, 2024 the Debtors filed their jointly administered voluntary chapter 11 cases.
2. On June 7, 2024 the Debtors filed their *Motion By Affected Debtors For Entry Of An Order Authorizing Use Of Cash Collateral Pursuant To 11 U.S.C. § 363(c)(2)* ("Motion") (Docket No. 87).
3. The initial hearing on the Motion was held on June 20, 2024 on shortened time.
4. A continued hearing was scheduled for July 23, 2024, at 11:00 a.m.
5. On June 17, 2024, Wells Fargo filed Oppositions to Debtor's Motion with respect to the 2220 Bagley and 3538 Greenfield Properties. (*See* Docket Nos. 100 and 101).
6. On June 18, 2024, Archway filed a *Status Report re Objection by Archway Real*

1 *Estate Income Fund I SPE I, LLC to Motion by Affected Debtors for Entry of an Order Authorizing*  
2 *Use of Cash Collateral Pursuant to 11 U.S.C. § 363(c)(2)* (“Status Report”) (Docket No. 104). In the  
3 Status Report, Archway consented to limited use of cash collateral on an interim basis under certain  
4 conditions set forth therein, including that Archway’s rights and remedies with respect to the  
5 Archway Objection be reserved and preserved and that it be granted certain adequate protection,  
6 including a replacement lien and restrictions on the use of cash collateral, as set forth therein  
7 (collectively, “Archway Rights and Protections”).

8 7. On July 18, 2024, the Court entered its order authorizing the Debtors’ interim use of  
9 cash collateral through July 23, 2024 (Docket No. 127) (the “Interim Cash Collateral Order”). The  
10 Interim Cash Collateral Order sets forth, preserves, and reaffirms certain rights and adequate  
11 protection measures in favor of the Lenders, including the Archway Rights and Protections  
12 (collectively, the “Lender Rights and Protections”).

13 8. A continued hearing on interim use of cash collateral was scheduled for July 23,  
14 2024.

15 9. On July 22, 2024, the Debtors and Lenders submitted a stipulation to continue the  
16 hearing interim use of cash collateral and extend authorization for use of cash collateral by  
17 approximately one month to August 27, 2024 (Docket No. 131).

18 10. On July 23, 2024, the Court entered its order approving the stipulation, thereby  
19 authorizing the use of cash collateral and continuing the hearing to August 27, 2024.

20 11. On August 26, 2024, the Debtors and Lenders submitted a stipulation to further  
21 continue the hearing on interim use of cash collateral and to extend authorization for use of cash  
22 collateral to October 8, 2024 (Docket No. 174).

23 12. On August 26, 2024, the Court entered its order approving the stipulation, which  
24 authorized cash collateral use and continued the hearing to October 8, 2024 (Docket No. 176).

25 13. The Lenders and the Debtors remain engaged in negotiations regarding the terms of  
26 long-term authorization for the Debtors’ use of cash collateral and require more time to negotiate  
27 those terms.  
28

14. Accordingly the Lenders and the Debtors enter into this stipulation.

**STIPULATION**

15. The foregoing recitals are incorporated herein.

16. The Lenders and the Debtors stipulate and agree that the hearing on the Motion should be further continued from October 8, 2024, at 11:00 a.m. to November 12, 2024 at 11:00 a.m. (based on the Court's "Available Self-Calendaring Dates"), or to another date convenient to the Court that is approximately one month after October 8, 2024.

17. The Lenders and the Debtors stipulate and agree that the Debtors' authorization to use cash collateral should be extended through the same date as the further continued hearing.

18. The Lenders and the Debtors stipulate and agree that all the terms of the Interim Cash Collateral Order shall remain in full force and effect and unchanged except for the extension of the period of authorization to use cash collateral and the continuance of the hearing date on the Motion.

**IT IS SO STIPULATED.**

Dated: October 3, 2024

**SAUL EWING LLP**

By: /s/ Zev Shechtman  
Zev Shechtman, Attorneys for Individual Debtors

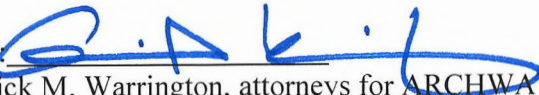
Dated: October 2, 2024

**WEINTRAUB ZOLKIN TALERICO & SELTH  
LLP**

By:   
Derrick Talerico, Attorneys for Corporate Debtors


1  
2 Dated: October 2, 2024

**FRANDZEL ROBINS BLOOM & CSATO, L.C.**

3  
4 By:   
5 Gerrick M. Warrington, attorneys for ARCHWAY  
6 REAL ESTATE INCOME FUND I SPE I, LLC

7  
8 Dated: October 3, 2024

**HEMAR, ROUSSO & HEALD, LLP**

9  
10 By:   
11 Jacqueline L. James , attorneys for HARVEST  
12 SMALL BUSINESS FINANCE, LLC

13  
14 Dated: October \_\_, 2024

**ALDRIDGE PITE, LLP**

15  
16 By: \_\_\_\_\_  
17 Todd S. Garan, attorneys for WELLS FARGO  
18 BANK NATIONAL WEST  
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2 Dated: October \_\_, 2024

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Gerrick M. Warrington, attorneys for ARCHWAY  
5 REAL ESTATE INCOME FUND I SPE I, LLC


6 Dated: October \_\_, 2024

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Jacqueline L. James , attorneys for HARVEST  
9 SMALL BUSINESS FINANCE, LLC

10 Dated: October 2, 2024

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## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:  
Saul Ewing LLP, 1888 Century Park East, Suite 1500, Los Angeles, CA 90067

A true and correct copy of the foregoing document entitled (*specify*): **Stipulation to Further Continue Hearing on Motion to Authorize use of Cash Collateral Pursuant to 11 U.S.C. § 363(c)(2)** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) **October 3, 2024**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

- **Scott R Albrecht** salbrecht@gsaattorneys.com, jackie.nguyen@sgsattorneys.com
- **Tanya Behnam** tbehnam@polsinelli.com, tanyabehnam@gmail.com; ccripe@polsinelli.com; ladocketing@polsinelli.com
- **Jacquelyn H Choi** jacquelyn.choi@rimonlaw.com, docketingsupport@rimonlaw.com
- **Carol Chow** Carol.Chow@saul.com, easter.santamaria@saul.com
- **Robert F Conte** robert.conte@usdoj.gov, caseview.ecf@usdoj.gov; usacac.tax@usdoj.gov
- **Ryan Coy** ryan.coy@saul.com, hannah.richmond@saul.com
- **Christopher Cramer** secured@becket-lee.com
- **Turner Falk** turner.falk@saul.com, tnfalk@recap.email
- **Michael G Fletcher** mfletcher@frandzel.com, sking@frandzel.com
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- **Jacqueline L James** jjames@hrhlaw.com
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- **Avi Edward Muhtar** amuhtar@crowndandstonelaw.com
- **Bruce D Poltrock** bpoltrock@frandzel.com, achase@frandzel.com
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- **Derrick Talerico** dtalerico@wztslaw.com, maraki@wztslaw.com, sfritz@wztslaw.com, admin@wztslaw.com
- **United States Trustee (LA)** ustpregion16.la.ecf@usdoj.gov
- **Gerrick Warrington** gwarrington@frandzel.com, achase@frandzel.com
- **Jennifer C Wong** bknotice@mccarthyholthus.com, jwong@ecf.courtdrive.com

☐ Service information continued on attached page

### **2. SERVED BY UNITED STATES MAIL:**

On (*date*) \_\_\_\_\_, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL** (*state method for each person or entity served*): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) \_\_\_\_\_, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

October 3, 2024  
Date

Hannah Richmond  
Printed Name

/s/ Hannah Richmond  
Signature

This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.